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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHANCE BRANNON,

Defendant

Case: 8:23-CR-00100-CJC

DEFENDANT'S SUPPLEMENT TO
SENTENCING POSITION; EXHIBIT
F

Sentencing Date: April 15, 2024
Hearing Time: 9:00 a.m.

**TO THE HONORABLE CORMAC J. CARNEY, UNITED STATES
DISTRICT JUDGE, THE UNITED STATES ATTORNEY'S OFFICE AND
ITS ATTORNEYS OF RECORD, KATHRYNNE SEIDEN, AND UNITED
STATES PROBATION OFFICER JILL DACOSTA:**

Defendant CHANCE BRANNON (hereinafter the "*Defendant*"), by and
through counsel of record, Katherine Corrigan, hereby files Defendant's supplement to
his Position Re Sentencing (Exhibit F – letter from Defendant's father) in the above-
entitled matter.

DATED: April 2, 2024

_____/s/_____
Katherine Corrigan
Attorney for Defendant

I.

INTRODUCTION

Defendant respectfully submits this additional memorandum to provide information to assist the Court in fashioning a sentence “sufficient but not greater than necessary” to achieve the statutory purposes of punishment, as required by 18 U.S.C. Section 3553(a) in light of *United States v. Booker*, 125 U.S. 738 (2005).

This supplement is filed for the purpose of providing the Court with Defendant’s father’s letter to the Court. The letter provides the Court with additional insight into the Defendant’s view of his actions, his reflection on his actions and his acceptance of responsibility.

After full analysis of the sentencing factors in this case, the information provided by the defense and probation, the Defendant requests that the Court impose the following sentence and make the following recommendations:

1. No more than 60 months imprisonment
2. 3-year supervised release
3. Imposition of no fine
4. Imposition of a \$325 special assessment
5. The conditions of supervised release articulated in the sentencing recommendation letter found at Docket entry 88
6. A recommendation the Bureau of Prisons house Defendant FCI Englewood (Colorado) due to services it makes available to veterans.

DATED: April 2, 2024

Respectfully submitted,

_____/s/_____
Katherine Corrigan

CERTIFICATE OF SERVICE

I, Katherine Corrigan, declare:

That I am a citizen of the United States and resident or employed in Orange County, California; that my business address is Corrigan Welbourn & Stokke, APLC, 4100 Newport Place, Suite 550, Newport Beach, California 92660; that I am over the age of eighteen years, and am not a party to the above-entitled action;

That on ***April 2, 2024***, I caused to be transmitted via facsimile or e-mail to the person(s) below and addressed as follows:

DEFENDANT'S SUPPLEMENT TO SENTENCING POSITION; EXHIBIT F

on the following persons:

Jill DaCosta, USPO Via E-Mail Jill_DaCosta@cacp.uscourts.gov
United States Probation and Pretrial Services Office
Santa Ana, CA

AUSA Kathrynne Seiden Via email Kathrynne.Seiden@usdoj.gov
United States Attorney's Office
312 N. Spring St.
Los Angeles, CA 90012

This Certificate is executed on ***April 2, 2024*** at Newport Beach, California. I certify under penalty of perjury that the foregoing is true and correct.

Dated: April 2, 2024

_____/s/_____
Katherine Corrigan

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EXHIBIT F

April 1, 2024

Your Honor,

I am writing to you today with a plea for leniency in the sentencing of my son, Chance Brannon who has pled guilty to damaging an abortion clinic. As a father who loves him deeply, I am compelled to advocate for his future and wellbeing.

I want to begin by acknowledging the severity of the situation and the impact that his actions have had on others. There are no excuses for his behavior, and he fully accepts responsibility for his actions. However, I believe that there are important considerations that warrant your attention.

Chance is a very intelligent young man, but socially immature. He is deeply religious, and was influenced by much of what he's read online and experienced in the US Marines. Now saying that, both him and I realize that is not an excuse for his actions, he is solely responsible. But I firmly believe that my son is capable of redemption and rehabilitation. With the appropriate support and guidance, I am confident that he can overcome this setback and lead a meaningful and successful life. I am sure society will be better served by Chance going to university, which he planned to do after the Marines, than spending a long sentence incarcerated.

As his father, I have witnessed firsthand his regret and determination to make amends. He understands what he did is not the correct method to enact social change.

I respectfully ask for your consideration of a sentence that allows for the possibility of rehabilitation and a second chance. I understand the need for accountability, but I also believe in the power of forgiveness and mercy.

Thank you for taking the time to consider my plea. I am available to provide any further information or clarification you may require.

Sincerely,

Michael L Brannon